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UNITED STATES DISTRICT COURT

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DISTRICT OF NEVADA

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UNITED STATES OF AMERICA
ex rel. LAKEYSHA HOLMES, Relatrix,
and
LAKEYSHA HOLMES,

Plaintiffs,

v.

WIN WIN REAL ESTATE, INC., a Nevada
Corporation;
MOONLIT PROPERTIES, LLC, a Nevada
Limited Liability Corporation; and
FAISAL and SARAH CHAUDHRY,

Defendants.

Case No.: 2:13-cv-02149-APG-GWF

CONSENT JUDGMENENT

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22 WHEREAS, Relator Lakeysha Holmes brought certain claims on behalf of the United States
23 against Defendants Moonlit Properties, LLC and Faisal and Sarah Chaudhry (collectively
24 "Defendants");

25 WHEREAS, the Complaint alleges that Defendants unlawfully and fraudulently collected side
26 payments in addition to payments under the Section 8 Housing Choice Voucher program.;

1 WHEREAS, the Complaint further alleges that Defendants knew accepting each of these side
2 payments was a violation of the requirements of the Section 8 Housing Choice Voucher Program and
3 therefore false or fraudulent;

4 WHEREAS, the Complaint further alleges that Defendants' fraudulent conduct was material to
5 the United States' payments pursuant to the Section 8 Housing Choice Voucher Program;

6 WHEREAS, Defendants do not contest the accuracy of these allegations or any allegations set
7 forth in the Complaint filed in this action,

8 **THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED** as follows:

9 1. This court has jurisdiction over this matter under 31 U.S.C. § 3732 and 28 U.S.C. §§
10 1331, 1345, and 1335.

11 2. Defendants acknowledge their liability and agree to the entry of Judgment in favor of
12 Relator and the United States in the amount of \$85,000, which represents a fair and
13 reasonable settlement for the conduct, as is more fully set out in the Complaint filed in
14 this action.

15 3. Defendants agree to notify the United States Attorney's Office within 30 days of any
16 change of address, telephone number, or employment until the judgment debt is paid in
17 full, by providing such information to: United States Attorney's Office, 501 Las Vegas
18 Boulevard South, Suite 1100, Las Vegas, Nevada 89101.

19 4. The United States will record a judgment lien against Defendants to secure payment of
20 this judgment debt. Without otherwise limiting enforcement of the judgment, the
21 proceeds from the sale of any real estate in which Defendants have an interest may be
22 used to satisfy a portion or all of this judgment debt.

23 5. Defendants admit and acknowledges their actions, which gave rise to the present dispute
24 between the parties, constitute false pretenses, false representations, and/or fraud that
25 resulted in her obtaining payments from the Section 8 Housing Choice Voucher program
26 to which they were not entitled, and agree and acknowledge that the debt owed to the

United States as set forth herein is non-dischargeable in bankruptcy under 11 U.S.C. § 523.

6. Nothing in this Consent Judgment shall be construed to indicate an agreement by the United States concerning the characterization of the amounts paid hereunder for purposes of any proceeding under the Internal Revenue Code or to waive any claim of the Internal Revenue Service against Defendant.

UNITED STATES DISTRICT JUDGE

Dated: March 29, 2017.

Approved by:

Jonathan B. Lee
Marquis Aurbach Coffing
Attorney for Moonlit Properties, LLC
Faisal Chaudhry, and
Sarah Chaudhry

3-20, 2017

Ron Sung
Nevada Legal Services
Attorney for Lakeysha Holmes

3-22-2014

STEVEN W. MYHRE
United States Attorney

3-21-2017

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